

From: [Alice M. Keyes](#)
To: [Scully, Pam](#)
Cc: "Frank Anastasi"; [Megan Desrosiers](#); gec@glynnenvironmental.org
Subject: Re: GEC-Comments on LTM Plan
Date: Friday, October 15, 2021 11:18:06 AM
Attachments: [LCP-ProposedPlanFull11-20-14.pdf](#)

Ms. Scully,

Thank you for your service. I hope we have a chance to work together more to ensure Brunswick has a remedy that will keep the people and wildlife safe from the toxins at the Honeywell LCP superfund site.

As you may already know, One Hundred Miles has been operating since 2013. One of the first projects in which we engaged was the comment period for the Honeywell LCP site OU2 in 2014. During the public meeting to discuss the alternatives that EPA had considered for remediation, I stated that the preferred remedy was simply not enough. For those of us who live in Glynn County and understand the tidal system and the impact rising seas are having on our marshes and communities, it was obvious that the selected remediation – Alternative 6 – was not enough to protect the community from the continual release of PCBs and mercury into our water table for the following reasons:

1. it does not take into consideration rising sea level, and thin layers of sand will not hold up or contain the contaminants in the face of sea level rise and storm events,
2. it does not consider tidal velocity (like that experienced twice daily in Glynn marshes) and hurricanes (occurred more regularly here over the past 10 years, and
3. capping and covering up (with thin layers of sand) the heavily contaminated soils only postpones the release of dangerous contaminants.

We remain firm in our belief that the best remedy for the situation in the marshes is the removal of the contaminated sediments. In the attached document, this is Alternative 2. Dredging and removal activity would certainly cause a short-term spike in contaminants in the water table and would result in the loss of marshlands. But we feel dredging to remove contaminants, with the proper safety precautions, is the only way to meet the objective to reduce the contaminants that remain in our marshes and waterways and eliminate the seafood advisory for the Turtle River. It is 100% possible to achieve this goal with the correct actions are taken!

Related to the long-term monitoring proposal submitted to you for review, I would like to support the comments submitted to you by Ms. Thompson and GEC. It is ridiculous that any proposal would consider 5 years an acceptable long-term plan. The proposal presents an inadequate timeframe to determine the effectiveness of a plan and does not include the variety of species needed to determine effectiveness. The system in which the contaminants remain is complex and required a much more robust process for determining the

effectiveness. As we stated in 2014, any long-term monitoring should include biological monitoring of marine and terrestrial animals affected by the contaminants of concern. It is not enough to just test the water, fish and shellfish. It is certainly not enough to just base results on 24 samples over 5 year period. EPA must not accept such minimal effort.

Ms. Scully, previous excavation and remediation efforts have left dangerously high levels of PCBs, mercury, and cancer-causing polycyclic aromatic hydrocarbons (PAHs) in the marshes and tidal creek beds of the Turtle River system. As you are well aware, these toxins have the greatest impact on the subsistence fishermen and women who depend on local fish and seafood for sustenance. The Honeywell LCP Superfund site is surrounded by other industries and the ARCO neighborhood - named for the petroleum refinery that was located in the area, Atlantic Richfield Company (ARCO). The majority of the population in the ARCO community is predominantly African American women, children, and elderly, as well as a growing immigrant population. Proximity to pollution and consequentially low property values has disproportionately impoverished this area. In the neighborhood around the superfund site, 49% of households lived at or below the poverty level in 2017. Specifically, the ARCO area contains one of Glynn County's highest concentrations of elderly and persons in poverty. Demographics show that 57.7%, on average, of all the persons living in this area are persons in poverty. (US Census Bureau, American Community Survey, 2013).

I ask that you consider the charge the President has issued to all federal agencies, and the prerogative he has given to the US EPA - to prioritize federal assistance, funding, and programs to raise up communities of color and underserved affected by toxins. To quote Brenda Mallory, [Chair of the Council of Environmental Quality](#), *"For too long in this country, communities of color and low-income communities have not been given a voice in decisions that affect their health and well-being, contributing to dangerous levels of pollution being concentrated in places where many Americans live, work, and play."* The Honeywell LCP superfund site has blunted economic prosperity and poisoned citizens (young and old) for decades. Generations of low-income families have fished and continue to fish for meals in their PCP/mercury-laden waters in their neighborhood.

Glynn County, Georgia, is the poster-child for a community in need of EPA's regulatory arm to alleviate the environmental injustice that has blunted generations of communities of color and impoverished citizens. The time is past-due for the agency to hold Honeywell accountable for the damage they own. EPA must take this opportunity to collect the information you need to demonstrate that their minimal efforts will not meet the objectives of the Superfund program and the remedy must be significantly adjusted to account for rising sea levels, storms and continued distribution of the contaminants – removal of the contaminated sediments/marshlands.

Thank you for the opportunity to share these comments with you. Feel free to contact me at

any time if you would like to discuss.

Sincerely,

Alice M. Keyes
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From: Rachael Thompson <gec@glynnenvironmental.org>
Date: Friday, September 24, 2021 at 4:31 PM
To: "'Scully, Pam'" <scully.pam@epa.gov>
Cc: 'Frank Anastasi' <franksbiz@his.com>
Subject: GEC-Comments on LTM Plan

Ms. Scully,

Thank you for the opportunity to provide feedback on the Draft Long-Term Monitoring Plan (LTMP) that has been included in the 'Draft Pre-Final 95% Remedial Design'.

Attached, you will find the technical memorandum provided by our Technical Advisor (CC'ed here). Included in the memo are some of his technical comments on the LTMP (starting on page 12), and below you will find a summary of the Glynn Environmental Coalitions questions and concerns as well. We have also shared this information with our partners at One Hundred Miles (also CC'ed here) who share significant interest in the LTMP. They may share comments in addition to ours and have requested to be included in the future when informal requests for community input are provided. Please feel free to follow-up if you require any clarification or have questions about the summary below.

Questions:

- We understand that by using containment measures for certain areas of Operable Unit 1, a Five Year Review process will be started. Will the 5-year review process will include seafood sampling to continue to monitor potential human exposure to contaminants remaining in the estuary? Is it too soon to know that information?
 - Are there any plans to monitor and sample *Spartina Alterniflora* (Smooth Cordgrass) for vertical migration of contaminants in the Thin-Layer Cover areas?
1. The timeline of monitoring should extend beyond 5 years. Due to the extremely complex nature of our marsh and estuarine ecosystem, paired with the vast extent of contamination, we find it hard to believe that noticeable change can be seen within the first five years post remediation. Especially regarding the remedial action objectives that aim to prevent human exposure through the ingestion of fish and

shellfish. Our recommendation would be to extend the LTMP and subsequent individual monitoring schedules as detailed in Table 3 (as an example sampling taking place on Years 1, 3, and 5 could be extended to include 7, and 9, or Years 3 and 5 would then include 7 and 10, or whatever was deemed appropriate) to 10 years, if not beyond that. A shorter monitoring schedule could miss detectable levels of reductions in contamination and subsequent human exposure, which could prove the remedy ineffective. Whereas, a longer timeline could produce results in the later years that would indicate the remedy's effectiveness.

2. Any language regarding discontinuing monitoring before RAO's are met as is mentioned on page 24 (referenced below) should be removed. As referenced in the LTMP, the ROD states clearly that after the remedy has been implemented and monitored, the EPA can make a determination of whether or not a waiver is necessary due to the infeasibility of achieving limits within human health standards. Monitoring should persist as designed in the final LTMP and should not be allowed to be discontinued until it is complete. As mentioned earlier, a shortened timeline and/or discontinuing monitoring leaves the opportunity for crucial information to be gathered around the effectiveness of this remedy. We believe that it is well understood that the effectiveness of this remedy will take a very long time to be seen, as indicated in the LTMP itself: "response in fish and shellfish tissue may take several years" – pages 23 and 24; "may take many years if not a few decades", pages 20 and 24.
 - a. "Discontinuation of monitoring may occur earlier for some media or fish species than others, depending on attainment. If other elements of the remedy attain their respective CULs and standards but (for example) tissue concentrations do not, or if downward trends in tissue concentrations of mercury and Aroclor 1268 are delayed longer than anticipated."
3. Fish and shell fish monitoring should be expanded to include additional species and an increased number of samples per species. Ecological receptors, fiddler crabs and mummichogs, will have three composite samples from 7 locations for a total of 21 samples. Whereas the human health receptors, which are the bases for human health exposure to the local population, will only have three composite samples from two locations. This would total a mere **12 samples per species in year 3 and year 5**, a total of 24 samples over the 5 year period. This minimal level of sampling diminished the importance of trying to gauge the effectiveness of the remedy and it's ability to prevent human health exposure. The number of composite samples should be increased to at least 5 per location, and the number of locations should also be increased to include a location within Purvis Creek, Gibson Creek, and two locations within the Turtle River. Due to the extent and the severity of the contamination at this site, and it's implications on our local community's health, the PRP should be willing to take at least 100 fish and shell fish samples over the timeline of the monitoring of this remedy. It should be noted, as indicated previously, that we believe that the sampling period should be extended to at least 10 years. The likelihood of capturing the efficacy of the remedy at this level of sampling for only 5 years would seem to be extremely low.
4. Fish and shellfish species should include additional species that are under advisory:

Red fish (Red drum), blue crab, flounder, spot, black drum, striped mullet, Atlantic croaker, and sheepshead. The species that are currently under 'Do Not Eat advisories' (Croaker, Spot, and Striped Mullet), indicating they have highest level of health risk, are not included in the long term monitoring plan. At a minimum, Blue crab should be included due to the heavy reliance our local community has on this species. As the sole entity with a dedicated on the ground contractor canvassing local fishing areas, we understand that blue crab is one of the most common species caught for subsistence in areas around the site. Blue crabs also represent a different class of animals (invertebrates compared to finfish) and ecosystem niche when compared to seatrout and kingfish.

Thank you again for the opportunity to share our thoughts and concerns regarding the LTMP. Please don't hesitate to let me know if you have any questions, comments, or require clarification.

Best,

Rachael Thompson
Executive Director
Glynn Environmental Coalition
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